

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION**

AMERICAN ASSOCIATION OF
COLLEGES FOR TEACHER
EDUCATION, *et al.*,

Plaintiffs,

v.

DENISE CARTER, *et al.*,

Defendants.

Civil Action No. 25-cv-00702

**DECLARATION OF LAURIE MULLEN, PH.D., IN SUPPORT OF APPLICATION FOR
TEMPORARY RESTRAINING ORDER / PRELIMINARY INJUNCTION**

I, Laurie Mullen, Ph.D., declare and state under penalty of perjury the following:

1. I am the President of Maryland Association of Colleges for Teacher Education (“MACTE”), one of the plaintiffs in this case. I am also the Dean of the College of Education at Towson University.

2. I am over the age of 18, and I am competent in all respects to testify to the matters below. I understand that this Declaration is for use in connection with the above-captioned civil action, and I make this Declaration based upon my own personal knowledge and my review of the MACTE’s business records.

3. MACTE is a member organization that serves as a distinct statewide voice on matters of importance to educator preparation programs at Maryland’s colleges and universities. AACTE and MACTE collaborate to strengthen their advocacy efforts, share experience and expertise, and expand their members’ professional development opportunities. MACTE’s members include regionally accredited colleges and universities engaged in the preparation of professional school personnel with state program approval. In addition to hosting regular

professional learning activities, MACTE serves on the Council of Educational, Administrative and Supervisory Organizations of Maryland (CEASOM) Leadership Team, nominates three representatives to serve on the Professional Standards and Teacher Education Board, and represents Maryland preparation programs at AACTE.

4. MACTE's principal place of business is 304 Hawkins Hall, Towson University, Towson, MD 21252.

5. MACTE's mission is to serve as a distinct statewide voice on matters of importance to educator preparation programs at Maryland's colleges and universities. The termination of the Teacher Quality Partnership Program ("TQP") grants and the Supporting Effective Educator Development Program ("SEED") grants implicates MACTE's core mission. MACTE serves the institutions of higher education in Maryland for both the recruitment and retention of future teachers as well as the support and advancement of current classroom teachers. Both the TQP and SEED grants were focused on recruitment, retention of future teachers as well as the support of practicing teachers in Maryland.

6. MACTE has ten member organizations, all of which are residents of Maryland.

7. MACTE has three member organizations which were awarded SEED and TQP grants and impacted by the termination of the grants in February 2025, resulting in a substantial loss of funds for teacher preparation programs in Maryland.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 3 day of March, 2025

By: Laurie Mullen
Laurie Mullen, Ph.D.